

# The Jewett City Water Company

BUREAU OF WATER PROTECTION AND LAND REUSE PO Box 1088  
OFFICE OF THE BUREAU CHIEF, Enfield, CT 06083-1088  
Tel.: (800) 430-8073  
Fax: (860) 749-5381

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Paul E. Stacy  
Department of Environmental Protection  
Bureau of Water Protection and Land Reuse  
Planning & Standards Division  
79 Elm Street  
Hartford, CT 06106-5127

RE: Streamflow Regulations Public Comment

The Department of Environmental Protection (DEP) should be commended on its excellent progress on the development of the Streamflow Regulations. It is not an easy task to balance the different human uses of our State's waterways with the needs of fish and wildlife that depend on the same water to sustain healthy populations.

The Jewett City Water Company, which is located in Griswold, is a small drinking water utility that has less than 1900 customers. The company utilizes two wells and a small reservoir fed by two very small streams for its source water. Preliminary studies indicate that these sources will be impacted by the proposed regulation. In addition to being employed by the water company, I am also an avid trout fisherman and do understand and support the need for streamflow regulations. I do not feel; however, that these regulations as proposed should be adopted.

First; the Company believes that the streams should be classified before adopting the regulations, not after. This could be accomplished by passing two regulations. The first regulation would be to classify streams. This only makes sense and would also help water utilities and other stakeholders better understand the regulations relative to their respective systems.

Second; there are no exemptions for reservoirs or ground water systems that have had a history of not adversely affecting the ecosystems of the stream(s) involved. The Company's reservoir has been in service for over 100 years and because of the uniqueness of its design has never adversely affected the ecosystems of the streams involved. The registered wells also have not had a negative impact on the nearby streams.

Being a small company with a limited number of customers, any costs incurred by the company associated with the implementation of the proposed regulations such as engineering studies, installation of valve and piping arrangements, installation of flow

monitoring equipment and labor relative to flow monitoring, would have a financial impact on the company and its customers. These costs could be considered unjustifiable taking into account that history has proven no negative effects on the nearby streams.

In addition with reduced withdrawal rates, the ability to serve our customers with water for domestic uses and fire protection could be compromised at a cost with no added benefit to the environment.

The Jewett City Company feels that these issues do need to be addressed and that revisions of the regulation do need to be made before it is adopted.

The Jewett City Water Company would like to thank the DEP for the opportunity to comment on these regulations.

Sincerely,  
THE JEWETT CITY WATER COMPANY



Dave Fillion